

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 477**

**CERTIFICATION OF COUNSEL REGARDING APPLICATION FOR ORDER  
AUTHORIZING THE EMPLOYMENT AND RETENTION OF BROWN RUDNICK  
LLP AS COUNSEL FOR THE OFFICIAL COMMITTEE OF EQUITY SECURITY  
HOLDERS OF LORDSTOWN MOTORS CORP., ET AL.,  
NUNC PRO TUNC TO SEPTEMBER 7, 2023**

I, Brya M. Keilson, hereby certify as follows:

1. On September 27, 2023, the Official Committee of Equity Security Holders (the “Committee”) of Lordstown Motors Corp., *et al.*, filed the *Application for Order Authorizing the Employment and Retention of Brown Rudnick LLP as Counsel for the Official Committee of Equity Security Holders of Lordstown Motors Corp., et al., Nunc Pro Tunc to September 7, 2023* (the “Application”) [Docket No. 477] with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. The deadline to object to the Application was October 11, 2023.

3. The Committee received informal comments from the United States Trustee (the “US Trustee”) regarding the Application.

4. On October 12, 2023, the Committee filed the *Declaration of Andrew L. Sole, on Behalf of Esopus Creek Value Series Fund LP - Series "A", as Chairperson of the Official*

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

*Committee of Equity Holders of Lordstown Motors Corp., et al., in Support of the Application for Order Authorizing the Employment and Retention of Brown Rudnick LLP as Counsel Therefor, Nunc Pro Tunc to September 7, 2023 (the “Sole Declaration”) [Docket No. 549].*

5. By filing the Sole Declaration, the Committee has resolved the US Trustee’s comments, and the US Trustee has no objection to Application.

6. The undersigned further certifies that after reviewing the Court’s docket in this case, no formal answer, objection, or other responsive pleading to the Application appears thereon. The Committee respectfully requests that the Court enter the Order granting the Application, a copy of which was attached to the Application.

Dated: October 14, 2023  
Wilmington, Delaware

**MORRIS JAMES LLP**

*/s/ Brya M. Keilson* \_\_\_\_\_

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*Proposed Counsel to the Official Committee  
of Equity Security Holders*